

General Data Protection Regulation (GDPR)- City Financial Marketing Group Limited (hereafter CFM Group)

Complaints Policy

Purpose

CFM group is committed to providing a quality service for its employees and clients alike, in an open and accountable way. We aim to respond to complaints in confidence and in a prompt, polite manner.

Scope

This procedure addresses complaints from data subject(s) relating to the processing of their personal data, CFM Group handling of requests from data subject(s) and appeals from data subject(s) on how complaints have been handled.

Policy Statement

- CFM Group has appointed a GDPR representative responsible for GDPR – contact details are as follows: Elaine Maher gdpr@cfmgroup.ie
- CFM Group has clear guidelines on the Complaints Policy page www.cfmgroup.ie and relevant contact details. Any queries or complaints from the data subject(s) will be sent directly to the GDPR representative.
- CFM Group clearly provides data subject(s) with its Privacy Notice by publishing it on its website www.cfmgroup.ie clearly under the GDPR section or in word format which can be requested at any time by emailing gdpr@cfmgroup.ie.
- Data subject(s) may submit a claim regarding the following:
 - How their personal data has been processed
 - How their request for access to data has been handled
 - How their complaint has been handled
 - Appeal against any decision made following a complaint.
- Data subject(s) lodging a complaint with the GDPR representative for CFM Group may do so by means of email direct to Elaine Maher email address gdpr@cfmgroup.ie
- Data subject(s) may also lodge a complaint in writing. Note: All employees should be aware of the process relating to Subject Access Requests (SAR's). Complaints received by telephone will not be accepted and will need to be in writing.
- Complaints are to be resolved within timeframe allowed under the Consumer Protection Code 2012 as laid down by the Central Bank of Ireland.



- Appeals on the handling of complaints are to be resolved within the timeframe allowed under the Consumer Protection Code 2012.
- If CFM Group fails to act on a data subject(s) access request within 30 days or refuses the request, it must specify in clear and plain language the reasons it was unable to respond or indeed, why the request was refused.
- CFM Group will also inform the data subject(s) of their right to complain directly to the supervisory authority (Office of the Data Protection Commissioner). In doing so, CFM Group provides the data subject(s) with the contact details of the supervisory authority : Office of the Data Protection Commissioner. Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23 and informs them of their right to seek judicial remedy.

Roles and Responsibilities

- All Employees/Staff are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the GDPR representative for CFM Group, Elaine Maher.
- CFM Group GDPR representative is responsible for dealing with all complaints in line with this procedure.

Contacts

- Elaine Maher, GDPR representative gdpr@cfmgroup.ie 01 660 6900

Policy Review

- | | |
|------------------------------------|---|
| • Policy Prepared For: | CFM Group & all Trading Names |
| • Approved by Board/Management On: | Jonathan Hehir, 10th May 2018 |
| • Policy Became Operational On: | May 25th 2018 |
| • Next Review Date: | January 2018 |

